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*Attorneys for Plaintiff Kathy Keatley Garvey*

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**UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH**

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KATHY KEATLEY GARVEY,

Plaintiff,

v.

BUZZNICK, LLC AND STATIC MEDIA,  
LLC,

Defendants.

**DECLARATION OF KARTHIK  
NADESAN IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
ATTORNEY FEES**

2:22-cv-00400-DBB

Judge David B. Barlow

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I, Karthik Nadesan, declare and say:

1. I am an attorney at law duly licensed to practice before the United States District Court for the District of Utah. I am an attorney with the law firm Nadesan Beck, P.C. and am counsel of record for Plaintiff Kathy Keatley Garvey ("Garvey" or "Plaintiff").

2. I provide this declaration in support of Plaintiff's Motion for Attorney Fees Against Defendants Buzznick, LLC and Static Media, LLC (collectively "Defendants"). I have personal knowledge of the facts stated herein, and if called as a witness, I could and would competently testify thereto.

3. Attached as **Exhibit 1** is a summary of the work done and time spent by Nadesan Beck, P.C., in connection with this matter.

4. Though the matter was uncontested, time was spent drafting the Complaint in this matter, as well as obtaining entry of default and the default judgment.

5. The majority of the work in the case was performed by the law firm of SRIPLAW. The client has elected not to seek attorney fees for the work performed by SRIPLAW and the services and fees incurred by SRIPLAW have not been listed in this declaration.

6. Karthik Nadesan of Nadesan Beck P.C. had a billing rate of \$400.00 per hour in 2022. Mr. Nadesan is a partner at Nadesan Beck P.C. and have been practicing law since 2004. Mr. Nadesan has practiced before the Utah Supreme Court, the United States Supreme Court, and the United States Court of Appeals for the Tenth Circuit and been listed as a *Rising Star* and *Super Lawyer* by *Mountain States Super Lawyers*, selected as part of *Utah's Legal Elite* by *Utah Business Magazine*, and has an AV Preeminent peer-review rating by Martindale-Hubbell. Mr. Nadesan has served as President of the Utah State Bar Young Lawyer's Division, President of the Utah Minority Bar Association, and an ex-officio member of the Utah State Bar Commission. He was also a presenter and faculty member at the Utah State Bar Litigation Section's 2022 Trial Academy. Based on my experience and understanding of billing rates for Salt Lake County attorneys, this rate is competitive with those of other Salt Lake County attorneys of similar experience and for similar work during the relevant time.

7. Following the lodestar method of multiplying the per hour billing rate times the number of hours expended on the matter, the total amount of attorney's fees for Nadesan Beck's services are \$3,500.00.

8. I have reviewed the summary of attorney's fees and can verify the time spent and fees incurred in this action were reasonable and necessary under the circumstances.

I declare under perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 14, 2023

/s/ Karthik Nadesan  
Karthik Nadesan

**EXHIBIT 1**  
**Summary of Nadesan Beck Attorney Fees**

<b>Date</b>	<b>Description</b>	<b>Hours</b>
Jun 15 2022	Revise, finalize, and file complaint and civil cover sheet	3.0
Jul 1 2022	Revise, finalize, and file summonses	0.75
Sep 28 2022	Revise, finalize, and file motion for entry of default and response to order to show cause and proposed order on motion for entry of default	1.5
Apr 4 2023	Revise, finalize, and file motion for default judgment and response to order to show cause	2.0
Jun 14 2023	Revise, finalize, and file memorandum of costs and motion for attorney fees	1.5
	<b>Total</b>	<b>8.75</b>